

William L. Buus (SBN 180059)  
*wbuus@buuslaw.com*  
BUUS LAW GROUP APC  
3 Pointe Drive, Suite 110  
Brea, CA 92821  
Telephone: (949) 825-6140  
Facsimile: (949) 825-6141

Attorneys for Plaintiffs  
WINGSAIL HOLDINGS, LLC and  
YUNFEI “KRISTY” BAI

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

WINGSAIL HOLDINGS, LLC, a Washington Corporation, and YUNFEI “KRISTY” BAI, an individual,	) Case No.: 8:23-CV-02398-JWH-DFM
Plaintiffs,	) SUPPLEMENTAL DECLARATION
vs.	) OF WILLIAM L. BUUS IN SUPPORT
ANDREW POLSKY, an individual, and	) OF PLAINTIFFS’ EX PARTE
SEFED, a California Corporation, and	) APPLICATION TO CONTINUE
DOES 1 through 10,	) TRIAL AND RELATED DATES AND
Defendants.	) DEADLINES

I, William L. Buus, declare and state as follows:

1. I am an attorney licensed to practice law before all courts of the State of California, as well as the United States District Court, Central District of California, and I am presently counsel of record for plaintiffs herein, WINGSAIL HOLDINGS, LLC and YUNFEI “KRISTY” BAI. I have personal knowledge of the following facts and, if called as a witness, could and would competently testify thereto. I submit this supplemental declaration in support of Plaintiff’s ex parte application to continue trial and extend related dates and deadlines to address evidence and argument raised by Defendants in opposition to the application.

2. As I previously mentioned, I substituted as Plaintiffs’ counsel of

1 record herein on May 21, 2025. While I cannot speak to the diligence of counsel  
2 who preceded me, at all times, I acted diligently in reviewing the case file and  
3 determining what is needed to prepare the case for settlement discussions and/or  
4 trial. In that review, I noticed that the case was not at issue and that Plaintiffs have  
5 therefore not been given a reasonable opportunity to conduct discovery into the  
6 denials, affirmative defenses, and whatever other additional matter Defendants  
7 choose to include in their answer to the complaint. As it stands, Plaintiffs will not  
8 be able to conduct any of that discovery. Defendants have not addressed the  
9 inherent unfairness of that and apparently desire that Defendants not have that  
10 opportunity at all. Simply put, that would not be just and would be unduly  
11 prejudicial to Plaintiffs.

12 3. As to the date of Defendant Andrew Polsky's deposition, I  
13 communicated with counsel for Defendants about that in June of 2025, and he  
14 provided dates of his and his client's availability. The only date that was offered  
15 that did not conflict with any other work obligations was July 22<sup>nd</sup>, even though I  
16 was scheduled to take a vacation that week. So, I was left with the choice of  
17 scheduling it for that day or not scheduling it at all and taking the risk that it may  
18 not ever be taken. I chose to protect my client's rights, even if it is potentially  
19 inconvenient to me personally.

20 4. As to Defendants' argument that I appeared on behalf of Plaintiffs,  
21 knowing the present trial date and, therefore, have voluntarily assumed the conflict  
22 risk, I simply tried to make myself available to litigants to a lawsuit who needed  
23 my help. If the Court does not believe that my calendar conflict is sufficient to  
24 warrant a continuance of trial, I understand that. But given the other circumstances  
25 explained in the ex parte application and this declaration, I believe good cause

26 ///

27 ///

28 ///

1 exists for a short, three and one-half month long continuance of trial and extension  
2 of related dates and deadlines.

3 I declare under penalty of perjury under the laws of the United States of  
4 America that the foregoing is true and correct. Executed on July 16, 2025, at Brea,  
5 California.

6 /s/ William L. Buus

7 William L. Buus  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**PROOF OF SERVICE**

I am employed in the County of Orange, State of California. I am over the age of eighteen (18) years and am not a party to the within action. My business address is that of 3 Pointe Drive, Suite 110, Brea, California 92821.

I hereby certify that on July 16, 2025, I electronically filed the foregoing SUPPLEMENTAL DECLARATION OF WILLIAM L. BUUS IN SUPPORT OF PLAINTIFFS' EX PARTE APPLICATION TO CONTINUE TRIAL AND RELATED DATES AND DEADLINES with the Clerk of the Court using ECF which will send notification and a copy of such filing to the following persons:

Alejandro S. Angulo, Esq.  
*aangulo@rutan.com*  
Joelle Leib, Esq.  
*jleib@rutan.com*  
RUTAN & TUCKER, LLP  
18575 Jamboree Road, 9<sup>th</sup> Floor  
Irvine, California 92612  
Tel.: 714-641-5100  
Fax: 714-546-9035

Attorneys for Defendants ANDREW POLSKY and SEFED

Executed on July 16, 2025, at Brea, California. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

/s/ William L. Buus